# UNITED STATES DISTRICT OF WISCONSHICT-WI

UNITED STATES OF AMERICA,

2018 SEP 11 P 3: 32

STEPHEN ULURIES

CLERK

**SEALED** 

Plaintiff,

Case No.

18-CR-176

CHADWICK GRUBBS,

v.

Defendant.

[Title 18, United States Code, Sections 247(a)(2) and (d)(3), 844(e), 876(c)]

#### INDICTMENT

# **COUNT ONE**

#### THE GRAND JURY CHARGES:

On or about May 7, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### **CHADWICK GRUBBS**

knowingly and intentionally obstructed and attempted to obstruct by threat of force persons at the Harry and Rose Samson Family Jewish Community Center (JCC) in the enjoyment of their free exercise of religious beliefs, and the offense was in and affected interstate and foreign commerce, and such acts included the threatened use of a dangerous weapon, explosives, and fire.

In violation of Title 18, United States Code, Sections 247(a)(2) and (d)(3).

#### **COUNT TWO**

#### THE GRAND JURY FURTHER CHARGES:

On or about May 15, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### **CHADWICK GRUBBS**

knowingly and intentionally obstructed and attempted to obstruct by threat of force persons at the Harry and Rose Samson Family Jewish Community Center (JCC) in the enjoyment of their free exercise of religious beliefs, and the offense was in and affected interstate and foreign commerce, and such acts included the threatened use of a dangerous weapon, explosives, and fire.

In violation of Title 18, United States Code, Sections 247(a)(2) and (d)(3).

#### COUNT THREE

#### THE GRAND JURY FURTHER CHARGES:

On or about May 16, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### **CHADWICK GRUBBS**

knowingly and intentionally obstructed and attempted to obstruct by threat of force persons at the Harry and Rose Samson Family Jewish Community Center (JCC) in the enjoyment of their free exercise of religious beliefs, and the offense was in and affected interstate and foreign commerce, and such acts included the threatened use of a dangerous weapon, explosives, and fire.

In violation of Title 18, United States Code, Sections 247(a)(2) and (d)(3).

#### **COUNT FOUR**

#### THE GRAND JURY FURTHER CHARGES:

On or about May 16, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### **CHADWICK GRUBBS**

knowingly, through the use of the mail, willfully made a threat concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate individuals at the Harry and Rose Samson Family Jewish Community Center (JCC) and unlawfully to damage and destroy a building and real and personal property, to wit: the Harry and Rose Samson Family Jewish Community Center (JCC) and its contents, by means of fire and an explosive.

In violation of Title 18, United States Code, Section 844(e).

#### **COUNT FIVE**

## THE GRAND JURY FURTHER CHARGES:

On or about May 7, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### **CHADWICK GRUBBS**

knowingly deposited in an authorized depository for mail matter, to be sent and delivered by the Postal Service, a communication with or without a name or designating mark subscribed thereto, addressed to another person, to wit: persons at the Harry and Rose Samson Family Jewish Community Center (JCC), and containing a threat to injure the person of the addressee and of another, to wit: persons at the JCC.

In violation of Title 18, United States Code, Section 876(c).

# **COUNT SIX**

#### THE GRAND JURY FURTHER CHARGES:

On or about May 15, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### **CHADWICK GRUBBS**

knowingly deposited in an authorized depository for mail matter, to be sent and delivered by the Postal Service, a communication with or without a name or designating mark subscribed thereto, addressed to another person, to wit: persons at the Harry and Rose Samson Family Jewish Community Center (JCC), and containing a threat to injure the person of the addressee and another, to wit: persons at the JCC.

In violation of Title 18, United States Code, Section 876(c).

### COUNT SEVEN

#### THE GRAND JURY FURTHER CHARGES:

On or about May 16, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### CHADWICK GRUBBS

knowingly deposited in an authorized depository for mail matter, to be sent and delivered by the Postal Service, a communication with or without a name or designating mark subscribed thereto, addressed to another person, to wit: persons at the Harry and Rose Samson Family Jewish Community Center (JCC), and containing a threat to injure the person of the addressee and another, to wit: persons at the JCC.

In violation of Title 18, United States Code, Section 876(c).

FOREPERSON

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MATTHEW D. KNUEGER

United States Attorney